

# EXHIBIT A

**Harkins, Steven M. (Shld-ATL-LT)**

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**From:** Harkins, Steven M. (Shld-ATL-LT)  
**Sent:** Thursday, August 17, 2023 2:31 PM  
**To:** TIV@stevenslee.com  
**Cc:** valpec@kirtlandpackard.com; DECValsartan@btlaw.com; Judge\_Robert\_Kugler@njd.uscourts.gov; Loretta\_Smith@njd.uscourts.gov  
**Subject:** IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION - Parties' Proposed Order Memorializing Losartan/Irbesartan Discovery Deadlines  
**Attachments:** PROPOSED Stipulation Regarding Losartan and Irbesartan Discovery Schedule.docx

Judge Vanaskie,

Please find attached the parties' proposed order memorializing the agreed deadlines for losartan and irbesartan discovery discussed with the Court at the August 3<sup>rd</sup> Case Management Conference.

Thank you once again for your attention to and consideration of these issues.

Best,

**Steven M. Harkins**  
Shareholder

Greenberg Traurig, LLP  
Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
T +1 678.553.2312 | F +1 678.553.2441  
[harkinss@gtlaw.com](mailto:harkinss@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CASE MANAGEMENT ORDER NO. [REDACTED]**

**ORDER REGARDING MANUFACTURER DEFENDANTS' LOSARTAN AND  
IRBESARTAN DISCOVERY SCHEDULE**

IT IS HEREBY ORDERED that the following schedule will apply to the manufacturer defendants' document productions responsive to written discovery served pursuant to section 5 of CMO 32 (ECF No. 2343):

- **August 31, 2023:** Deadline to submit disputes regarding written discovery, search terms, and custodians to the Court. Any outstanding issues must be argued before Judge Vanaskie at the September Biweekly Conference Call.
- **December 15, 2023:** Deadline to produce noncustodial documents.
- **February 28, 2024:** Deadline to complete custodial production.

Dated: \_\_\_\_\_

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Hon. Robert B. Kugler  
United States District Court Judge